

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

MARCUS O'DELL

Plaintiff,

v.

Case No. 18-12163

Hon. Victoria A. Roberts

**FCA US, LLC.,
GP STRATEGIES CORPORATION,
and POPULUS GROUP, LLC.**

Defendants.

GOLD STAR LAW, P.C.

David A. Hardesty (P38609)

Caitlin E. Malhiot (P76606)

Attorneys for Plaintiff

2701 Troy Center Dr., Ste. 400

Troy, Michigan 48084

(248) 275-5200

dhardesty@goldstarlaw.com

cmalhiot@goldstarlaw.com

JACKSON LEWIS P.C.

Allan S. Rubin (P44420)

Daniel C. Waslawski (P78037)

Attorneys for Defendant FCA US, LLC

2000 Town Center, Suite 1650

Southfield, Michigan 48075

(248) 936-1900

allan.rubin@jacksonlewis.com

daniel.waslawski@jacksonlewis.com

LITTLER MENDELSON, P.C.

Gary C. Ankers (P41599)

Sarah L. Simmons (P74931)

Attorneys for Defendant Populus Grp, LLC

200 Renaissance Center Suite 3110

Detroit, MI 48243

(313) 446-6400

gankers@littler.com

slsimmons@littler.com

JOINT MOTION TO STAY

NOW COMES the Plaintiffs and Defendants, by and through their respective counsel and hereby move this Honorable Court to stay the proceedings in this matter. In support of their Motion, the Plaintiff states:

1. The parties have agreed to dismiss this case without prejudice as to Defendant Populus Group, LLC, and submit the claims against Populus Group, LLC to arbitration.

2. The arbitration of the claims against Populus Group, LLC, may resolve the entire matter, and will affect the remaining claims against the other Defendants.

3. The parties now request a stay of all court proceeding pending the conclusion of arbitration.

4. The parties do not wish to use this Honorable Court's resources and valuable time in litigating this matter as they believe that arbitration may resolve this case, or will at least affect this case in such a way that proceeding with litigation at this stage is not practical.

WHEREFORE, the parties pray that this Court will grant their Joint Motion to Stay.

Respectfully submitted,

GOLD STAR LAW, P.C.

/s/ Caitlin E. Malhiot
Caitlin E. Malhiot (P76606)
Attorneys for Plaintiff

JACKSON LEWIS P.C.

/s/ Allan S. Rubin (w/ consent)
Allan S. Rubin (P44420)
Daniel C. Waslawski (P78037)
Attorneys for Defendant FCA US, LLC

LITTLER MENDELSON, P.C.

/s/ Gary C. Ankers (w/ consent)
Gary C. Ankers (P41599)
Sarah L. Simmons (P74931)
Attorneys for Defendant Populus Grp., LLC

Date: September 26, 2018